



Kathy D. Patrick
Partner
kpatrick@gibbsbruns.com
713.751.5253

March 20, 2019

Via CM/ECF

Hon. Joseph A. Dickson, U.S.M.J.
United States District Court – District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Occidental Chemical Corp. v. 21st Century Fox Am., Inc., et al.*
Civil Action No. 2:18-cv-11273-MCA-JAD

Dear Judge Dickson:

We write to advise that the Small Parties Group has now determined it will agree to entry of the Sampling Protocol *without* the previously contested language. A copy of their correspondence advising of this agreement is attached. Other liaison counsel have confirmed that they, too, agree that the Protocol may be entered without the contested language. A copy of the Order without the disputed language is attached for the Court's signature.

With this agreement, the parties do not believe a conference on the Sampling Protocol will be needed on March 28, 2019.

Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kathy Patrick".

Kathy D. Patrick

/s/ *John J. McDermott*

John J. McDermott

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cc: All counsel of record (via CM/ECF)

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